

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: ASBESTOS PRODUCTS LIABILITY : CIVIL ACTION NO. MDL-875  
LITIGATION (NO. VI) : Becnel 2:08-cv-84556-ER

---

This Document Relates to:

---

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF LOUISIANA**

Becnel, Gayle, *et al.* :  
v.  
Anco Insulations, Inc., *et al.* : Civil Action No. 3:07-cv-315-FJP-DLD

---

**STATEMENT OF UNCONTESTED MATERIAL FACTS**

Northrop Grumman Ship Systems, Inc., formerly known as Avondale Industries, Inc. (n/k/a Northrop Grumman Shipbuilding, Inc.) ("Avondale"), submits the following Statement of Uncontested Material Facts for the sole purpose of supporting, and in connection with, its Motion for Summary Judgment:

1. Avondale Shipyards, Inc. n/k/a Northrop Gunman Shipbuilding, Inc. is and has always been adjacent to the navigable waters of the United States of America. *See* Affidavit of Albert L. Bossier, Jr.
2. Avondale Shipyards, Inc., n/k/a Northrop Grumman Shipbuilding, Inc., is and has always been in the business of constructing and/or repairing marine vessels. *See* Affidavit of Albert L. Bossier, Jr.
3. While employed at Avondale, Carl Becnel, Sr.'s work was related to the construction and/or repair of marine vessels. *See*, Affidavit of Albert L. Bossier, Jr.

Respectfully Submitted:

*/s/ Edwin A. Ellinghausen, III*

---

BRIAN C. BOSSIER (#16818)  
EDWIN A. ELLINGHAUSEN (#1347)  
CHRISTOPHER T. GRACE, III (#26901)  
BLUE WILLIAMS, L.L.P.  
3421 N. Causeway Blvd., Suite 900  
Metairie, LA 70002-3760  
Telephone: (504) 831-4091  
Facsimile: (504) 831-3055  
Counsel for Northrop Grumman Ship Systems, Inc.,  
formerly known as Avondale Industries, Inc. (n/k/a  
Northrop Grumman Shipbuilding, Inc.)

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been served on all counsel of record by facsimile, by email by placing copy of the same in the U.S. mail, postage pre-paid and properly addressed, this 29<sup>th</sup> day of November, 2010.

*/s/ Edwin A. Ellinghausen, III*

---